

Title:

Mr

Forename:

Dominic

Surname:

Smith

Representing:

Self

Organisation (if applicable):

Email:

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1:Do you agree with the proposal to include, as a matter of course, the 470 kHz and 5 MHz bands into the Licence for all Amateur Radio (Full) licensees?:

Yes. This seems to be a very useful simplification.

Question 2:Do you agree that expressly linking a Full (Club) Licensee?s authorisation to use the spectrum to his or her representation of a named club, and by adding a further ground for revoking the Licence to include circumstances where the licensee no longer represents the club, will help ensure that a club?s call sign remains with the club?:

Yes, again I think this is sensible. In paragraph 2.35 you state, however, that the status quo already provides you with 'significant work'. I would question whether the proposed solution in 2.38 (having the club members presenting you with evidence that the individual had left the club) doesn't potentially result in an increased workload for you.

Question 3: Do you agree that Ofcom should include a further ground of revocation in the Licence as proposed above in order better to align Clause 4 with the definition of 'Disqualified Person'?:

Yes, although I would be concerned if this results in a large administrative burden in an attempt to keep your records cross-referenced with the significant number of people convicted for not having a television licence.

Since this latter offence has been reported

[<http://www.telegraph.co.uk/culture/tvandradio/bbc/10684639/Dodging-TV-licence-will-not-be-a-crime.html>] to be due for reclassification as a civil offence, however, I take it this would not be the case.

Question 4: Do you agree that the word 'automatically' should be removed from Clause 4(5) of the Licence, in relation to the revocation of the Licence for failure to comply with the revalidation requirements?:

Yes, if that better reflects your procedures, although I am slightly surprised that you have opted not to take the opportunity to include a revalidation date on the licence (paragraph 2.111) given the efforts you have put into publicising this aspect of the licence recently.

Question 5: Do you agree that Clause 15 of the Licence should be updated to reflect the wording included in Ofcom's General Licence Conditions Booklet?:

Yes.

Question 6: Do you agree that Clause 13 of the Licence should be amended to allow for a simpler, more flexible approach for identifying Amateur Radio stations?:

Yes, I agree with the spirit of this question, but not with the actual wording suggested in paragraph 2.61. It seems to me that:

'a) a station must be clearly identifiable at all times; b) a valid call sign for the station be transmitted as frequently as is practicable during transmissions to ensure that the station is clearly identified'

could imply that we should identify ourselves much more frequently than the present 15 minute rule (paragraph 2.59), since it could be argued to be 'practicable' to identify more regularly.

Question 7: Given the current uncertainty amongst Radio Amateur licensees in relation to Clause 2(2), do you believe that it would be a practical solution for Ofcom to remove this Clause and to insert additional wording into Clause 13, as proposed above?:

No - for two reasons:

- 1) For many amateur radio competitions ('contests') and awards, the constituent parts of the UK are classified separately. As a result, it is imperative to know in which country / Crown Dependency the station is located at the time of the contact. Changing this would involve re-educating radio amateurs globally and would undoubtedly cause additional confusion.
- 2) By your own admission, this would leave the Intermediate callsign format as an exception to the general format (paragraph 2.76). As someone who is involved in encouraging and teaching new amateurs, making this change would surely result in a lot of unnecessary confusion for newer radio amateurs who are upgrading from Foundation to Intermediate level.

Question 8: Do you agree with Ofcom's proposal to amend Clause 2(3) of the Licence to require Intermediate licensees to transmit a call sign that reflects the location of their main station?:

No - As per the first part of my response to question 7, many amateur radio award schemes and competitions globally assume that the callsign indicates the location of the operator at the time of the contact, not the main station. To alter this would result in confusion for all involved in those awards and competitions, both in the UK and around the world.

Question 9: Do you agree that replacing Clauses 2(1) and 16(1) with a new Clause to simplify and bring together all of the licence conditions relating to the operation of radio equipment away from the Main Station address will make these provisions clearer?:

Yes, this is sensible, although I note that the result of the proposed wording in paragraph 2.88 means that UK Full (Club) licences would no longer be able to be used in UK territorial waters. I see no particular problem with that, but wonder whether it was the intention? Incidentally, regarding paragraph 2.89, I believe the definition of 'At Sea' is relevant because it, in turn, refers to the definition of 'Tidal Water'. This makes it clear that maritime mobile operation also includes tidal rivers. If you remove paragraph 17(1)(e) of the licence document, therefore, I believe paragraph 17(1)(kk) also becomes redundant and, I assume, tidal rivers become 'mobile', not 'maritime mobile' locations?

Question 10: Do you agree that the proposed changes will clarify RAYNET operation under the Licence?:

Yes, permitting encrypted messages when in communication with User Services is a particularly welcome development having myself been involved in dilemmas of the sort referred to in paragraph 2.96.